Approved:

SAGAR K. RAII and ANDREW D. BEATY Assistant United States Attorneys

Before:

THE HONORABLE BARBARA C. MOSES United States Magistrate Judge Southern District of New York

19MAG1153

UNITED STATES OF AMERICA

- v. -

DEBORAH MENSAH, and ASSANA TRAORE,

Defendants.

Violations of 18 U.S.C. §§ 371,

SEALED COMPLAINT

1349, and 1956

COUNTY OF OFFENSE:

BRONX

SOUTHERN DISTRICT OF NEW YORK, ss.:

WILLIAM R. MCKEEN, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

(Conspiracy to Commit Wire Fraud)

- 1. From at least in or about June 2014 through in or about January 2019, in the Southern District of New York and elsewhere, DEBORAH MENSAH and ASSANA TRAORE, the defendants, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.
- 2. It was a part and an object of the conspiracy that DEBORAH MENSAH and ASSANA TRAORE, the defendants, and others known and unknown, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, knowingly would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose

of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349.)

(Conspiracy to Receive Stolen Property)

- 3. From at least in or about June 2014 through in or about January 2019, in the Southern District of New York and elsewhere, DEBORAH MENSAH and ASSANA TRAORE, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, a violation of Title 18, United States Code, Section 2315.
- 4. It was a part and object of the conspiracy that DEBORAH MENSAH and ASSANA TRAORE, the defendants, and others known and unknown, would and did receive, possess, conceal, store, barter, sell, and dispose of goods, wares, merchandise, securities, and money, of the value of \$5,000 and more, which had crossed a state boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted, and taken, in violation of Title 18, United States Code, Section 2315.

OVERT ACTS

- 5. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:
- a. On or about September 8, 2016, DEBORAH MENSAH, the defendant, received a wire transfer of approximately \$112,000 in fraud proceeds in a bank account MENSAH controlled in the Bronx, New York.
- b. On or about February 6, 2017, ASSANA TRAORE, the defendant, received a wire transfer of approximately \$20,000 in fraud proceeds in a bank account TRAORE controlled in the Bronx, New York.

(Title 18, United States Code, Section 371.)

COUNT THREE (Money Laundering Conspiracy)

- 6. From at least in or about June 2014 through in or about January 2019, in the Southern District of New York and elsewhere, DEBORAH MENSAH and ASSANA TRAORE, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit money laundering, in violation of Title 18, United States Code, Section 1956(a)(1)(B).
- 7. It was a part and object of the conspiracy that DEBORAH MENSAH and ASSANA TRAORE, the defendants, and others known and unknown, knowing that the property involved in certain financial transactions represented proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions, which in fact involved the proceeds of specified unlawful activity, to wit, wire fraud, in violation of Title 18, United States Code, Section 1343, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Section 1956(h).)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

8. I am a Special Agent with the FBI and I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation of this matter, my conversations with law enforcement agents, witnesses, and others, as well as my examination of report and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated. Where figures, calculations, and dates are set forth herein, they are approximate, unless stated otherwise.

Overview of the Conspiracy

- 9. Since in or about November 2017, the FBI has been investigating a criminal enterprise (the "Enterprise") based in Ghana that committed a series of frauds against individuals and businesses located across the United States, including in the Southern District of New York. The frauds perpetrated by the Enterprise consisted of business email compromises and romance scams.
- The Enterprise conducted the business email compromises through the spoofing of email accounts. Specifically, the Enterprise used slight variations on legitimate email addresses of employees of a company or third parties engaged in business with the company to trick other employees of the company with access to the company's finances into thinking the fake email accounts were authentic. The fake email accounts were then used to send instructions to wire money to certain bank accounts and also included fake authorization letters for the wire transfers that contained forged signatures of company employees. By using this method of deception, the Enterprise sought to trick the victims into transferring hundreds of thousands of dollars to bank accounts the victims believed were under the control of legitimate recipients of the funds as part of normal business operations, when in fact the bank accounts were under the control of members of the Enterprise.
- The Enterprise conducted the romance scams by using electronic messages sent via email, text messaging, or online dating websites that tricked the victims, many of whom were vulnerable, older men and women who lived alone, into believing the victim was in a romantic relationship with a fake identity assumed by members of the Enterprise. Once members of the Enterprise had gained the trust of the victims using the fake identity, they used false pretenses such as a shipment of gold or receiving a portion of an investment to cause the victims to wire money to bank accounts the victims believed were controlled by their romantic interests, when in fact the bank accounts were controlled by members of the Enterprise. At times, the members of the Enterprise also used false pretenses to cause the victims to receive funds in the victims' bank accounts, which, unbeknownst to the victims, were fraud proceeds, and to transfer those funds to accounts under the control of members of the Enterprise. The members of the Enterprise, posing as the romantic interest of the victims, also introduced the victims to other individuals purporting to be,

for example, consultants, lawyers, or bank employees, who then used false pretenses to cause the victims to wire money to bank accounts controlled by members of the Enterprise.

c. DEBORAH MENSAH and ASSNA TRAORE, the defendants, and other known and unknown members of the Enterprise, received fraud proceeds from victims, most of whom lived outside of New York State, in bank accounts that they controlled in the Bronx, New York. Once MENSAH and TRAORE received the fraud proceeds in bank accounts under their control, they withdrew, transported, and laundered those fraud proceeds to other members of the Enterprise.

Scheme to Defraud Victim-1

- 10. Based on the FBI's investigation of a romance scam involving a female individual over 60 years of age ("Victim-1"), as well as my conversations with Victim-1, I have learned the following, in substance and in part:
- a. On an online dating service for men and women over fifty years old, Victim-1 entered into an online relationship with a purported male individual ("Individual-1") who claimed to be a civil engineer who was about to retire.
- b. Individual-1 told Victim-1, in substance and in part, that Individual-1 was working on a road project in Ghana when he found an unspecified quantity of gold for sale and encountered several problems with the gold, including but not limited to taxes and export fees. Individual-1 thereafter repeatedly requested Victim-1 to provide him with various sums of money through a number of intermediaries, including but not limited to DEBORAH MENSAH and ASSANA TRAORE, the defendants. Individual-1 stated to Victim-1, in substance and in part, the following about MENSAH and TRAORE:
- i. MENSAH was the wife of Individual-1's good friend.
- ii. TRAORE worked at Bank of America and was MENSAH's sister.
- c. Based upon the above representations made by Individual-1, Victim-1 wired over \$175,000 to various persons and entities connected to the Enterprise, including MENSAH and TRAORE.

Scheme to Defraud Victim-2

- 11. Based on the FBI's investigation of a romance scam involving a female individual over 60 years of age ("Victim-2"), as well as my review of a report of information provided by Victim-2 to the FBI, I have learned the following, in substance and in part:
- a. Victim-2 entered into an online relationship with a purported male individual ("Individual-2") who claimed to be a U.S. Army contractor located in Damascus, Syria.
- b. Individual-2 told Victim-2, in substance and in part, the following:
- i. Individual-2 was supposed to leave Damascus soon and wanted to send approximately 90 kilograms of gold to Victim-2 that Individual-2 had earned as a reward after saving someone's life.
- ii. Individual-2 attempted to send a package containing the gold to Victim-2 but it was stopped by customs and Victim-2 needed to send money for various reasons, such as an import license, in order to release the package.
- c. Subsequently, an individual purporting to be a customs representative instructed Victim-2 to transfer money to DEBORAH MENSAH, the defendant. Victim-2 thereafter wired over approximately \$188,000 to two different bank accounts for MENSAH.
 - d. Victim-2 never received the package of gold.

Scheme to Defraud Victim-3

- 12. Based on the FBI's investigation of a romance scam involving a female individual over 50 years of age ("Victim-3"), as well as my review of a complaint by Victim-3 filed with the FBI, I have learned the following, in substance and in part:
- a. Victim-3 entered into an online relationship with a purported male individual ("Individual-3") from Germany who lived in Ghana.
- b. Individual-3 told Victim-3, in substance and in part, that Individual-3 had approximately 96 kilograms of gold in Ghana that he was sending to the United States for Victim-3

and that Individual-3 needed Victim-3's help to pay various fees related to the gold.

c. Based upon the above representations made by Individual-3 and other purported individuals that worked with Individual-3, Victim-3 wired over approximately \$288,000 to members of the Enterprise, including DEBORAH MENSAH, the defendant.

Scheme to Defraud Victim-4

- 13. Based on the FBI's investigation of a romance scam involving a female individual over 60 years of age("Victim-4"), as well as my review of a complaint filed by Victim-4 with the FBI and my interview of Victim-4, I have learned the following, in substance and in part:
- a. Victim-4 entered into an online relationship with a purported male individual ("Individual-4") who claimed to be a captain in the U.S. Army serving in Afghanistan who was about to retire.
- b. Individual-4 told Victim-4, in substance and in part, that Individual-4 was given some gold bars and jewelry in Afghanistan that he needed to get out of the country or he would be killed. Individual-4 further told Victim-4, in substance and in part, that he had no one else to help him, and Victim-4 agreed to help Individual-4 get the gold bars and jewelry out of Afghanistan.
- c. Individual-4 told Victim-4, in substance and in part, that Individual-4 had shipped a box containing the gold bars and jewelry to Victim-4. However, at various times, Individual-4 told Victim-4, in substance and in part, that the box was stuck in customs and that various taxes and fees needed to be paid in order for the box to be sent through to Victim-4.
- d. Based upon the representations made by Individual-4, Victim-4 took out over \$100,000 in loans and wired that money to various persons and commercial entities, including several transfers to ASSANA TRAORE, the defendant.

Scheme to Defraud Victim-5

14. Based on the FBI's investigation of a romance scam involving a male individual over 60 years of age ("Victim-5"), as well as my review of records for a bank account held by

Victim-5, I have learned the following, in substance and in part:

- a. Victim-5 entered into an online relationship with a purported female individual ("Individual-5") from Ghana who wanted help to immigrate to the United States to be with Victim-5.
- b. Individual-5 told Victim-5, in substance and in part, that Individual-5 inherited a plantation and 118 kilograms of gold and needed help to pay land fees and taxes for the sale of the plantation and freight charges for the shipping of the gold. In return, Victim-5 would receive funds directly into Victim-5's bank account.
- c. Based upon the above representations made by Individual-5, Victim-5 transferred over \$500,000 from the estate of his deceased father to various persons and entities, including several transfers to ASSANA TRAORE, the defendant.
- d. Victim-5 never received any money from Individual-5.
- 15. Based on my review of bank records regarding three bank accounts ("Account-1," "Account-2," and "Account-3," collectively, the "Mensah Accounts,") held by DEBORAH MENSAH, the defendant, at two different banks in the Bronx, New York, I have learned the following, in substance and in part:
- a. The Mensah Accounts were each held in the name of "Deborah O Mensah d/b/a Debra O Mensah Auto Sales" and the sole signatory on the Mensah Accounts was MENSAH.
- b. According to information provided to the banks for Account-1 and Account-2, "Deborah O Mensah d/b/a Debra O Mensah Auto Sales" was a home-based sole proprietorship involved in auto sales and the purpose of Account-1 and Account-2 were operating accounts.
- c. The same address for MENSAH in the Bronx, New York (the "Mensah Address") was provided to the banks for the Mensah Accounts.
- d. Account-1 received the following wire transfers from Victim-1, which total \$38,200:

- i. On or about September 14, 2016, Account-1 received a wire transfer of \$13,200 from Victim-1.
- ii. On or about September 19, 2016, Account-1 received a wire transfer of \$15,000 from Victim-1.
- iii. On or about October 27, 2016, Account-1 received a wire transfer of \$10,000 from Victim-1.
- e. Account-1 and Account-3 received the following wire transfers from Victim-2, which total \$188,400:
- i. On or about August 29, 2016, Account-3 received a wire transfer of \$16,000 from Victim-2.
- ii. On or about September 2, 2016, Account-3 received a wire transfer of \$10,000 from Victim-2.
- iii. On or about September 8, 2016, Account-3 received a wire transfer of \$112,000 from Victim-2.
- iv. On or about September 30, 2016, Account-1 received a wire transfer of \$15,400 from Victim-2.
- v. On or about October 7, 2016, Account-1 received a wire transfer of \$35,000 from Victim-2.
- f. Account-3 received the following wire transfers from Victim-3, which total \$288,340:
- i. On or about May 11, 2016, Account-3 received a wire transfer of \$80,000 from Victim-3.
- ii. On or about May 24, 2016, Account-3 received a wire transfer of \$101,190 from Victim-3.
- iii. On or about June 7, 2016, Account-3 received a wire transfer of \$87,150 from Victim-3.
- iv. On or about June 28, 2016, Account-3 received a wire transfer of \$20,000 from Victim-3.
- g. Between on or about June 26, 2014 and on or about November 22, 2016, the Mensah Accounts had deposits greater than approximately \$500 that totaled approximately \$2,344,000, and withdrawals greater than approximately \$500 that totaled approximately \$2,096,000. A majority of the deposits consisted

- of large wire transfers from various individuals, including Victim-1, Victim-2, and Victim-3, or cash deposits, and the withdrawals were largely in cash.
- 16. Based on my review of bank records regarding three bank accounts ("Account-4," "Account-5," and "Account-6," collectively, the "Traore Accounts,") held by ASSANA TRAORE, the defendant, at three different banks in the Bronx, New York, I have learned the following, in substance and in part:
- a. The Traore Accounts were each held in the name of "Assana Traore Cosmetic" and the sole signatory on the Traore Accounts was TRAORE.
- b. According to information provided to the bank for Account-4, "Assana Traore Cosmetic" was a home-based sole proprietorship with the following line of business: "Cosmetics, Beauty Supplies, and Perfume Stores." The purpose of Account-4 was "Operating Account."
- c. The same address in the Bronx, New York and the same phone number ending in 9642 (the "Traore Phone Number") were provided to the banks for Account-4 and Account-5.
- d. Account-4 received the following wire transfers from Victim-1, which total \$26,000:
- i. On or about December 21, 2016, Account-4 received a wire transfer of \$2,000 from Victim-1.
- ii. On or about January 9, 2017, Account-4 received a wire transfer of \$500 from Victim-1.
- iii. On or about January 12, 2017, Account-4 received a wire transfer of \$2,000 from Victim-1.
- iv. On or about January 17, 2017, Account-4 received a wire transfer of \$8,000 from Victim-1.
- v. On or about January 30, 2017, Account-4 received a wire transfer of \$13,500 from Victim-1.
- e. Account-4 and Account-5 received the following wire transfers from Victim-4, which total \$50,000:
- i. On or about February 6, 2017, Account-4 received a wire transfer of \$20,000 from Victim-4.

- ii. On or about February 10, 2017, Account-4 received a wire transfer of \$8,000 from Victim-4.
- iii. On or about February 15, 2017, Account-4 received a wire transfer of \$10,000 from Victim-4.
- iv. On or about March 22, 2017, Account-5 received a wire transfer of \$9,000 from Victim-4.
- v. On or about April 26, 2017, Account-5 received a wire transfer of \$3,000 from Victim-4.
- f. Account-5 received the following wire transfers from Victim-5, which total \$210,500:
- i. On or about May 30, 2017, Account-5 received a wire transfer of \$25,000 from Victim-5.
- ii. On or about June 7, 2017, Account-5 received a wire transfer of \$20,000 from Victim-5.
- iii. On or about June 8, 2017, Account-5 received a wire transfer of \$76,700 from Victim-5.
- iv. On or about June 9, 2017, Account-5 received a wire transfer of \$48,800 from Victim-5.
- v. On or about June 19, 2017, Account-5 received a wire transfer of \$40,000 from Victim-5.
- g. Between on or about December 12, 2016 and on or about July 17, 2017 a period of approximately seven months the Traore Accounts had deposits greater than approximately \$500 that totaled approximately \$877,000, and had withdrawals greater than approximately \$500 that totaled approximately \$813,000. A majority of the deposits consisted of large wire transfers from various individuals, including Victim-1, Victim-4, and Victim-5, or cash deposits, and the withdrawals were largely in cash.
- 17. On or about June 25, 2018, ASSANA TRAORE, the defendant, was interviewed by a paralegal of the United States Attorney's Office for the Southern District of New York in connection with TRAORE's signing of a bond for another member of the Enterprise ("CC-1"), who was charged with conspiracy to commit wire fraud and other charges for conduct related to the Enterprise. Based on my review of notes of that interview, I have learned the following, in substance and in part:

- a. TRAORE was born in Ghana and is a relative of CC-1.
- b. TRAORE worked as a teacher at a community child care center in the Bronx, New York.
- c. TRAORE provided the Traore Phone Number, which was provided to the banks at the time of the opening of Account-4 and Account-5, as her telephone number. 1
- 18. Based on my review of text messages extracted from a phone seized from CC-1 when CC-1 was arrested at the Mensah Address on or about June 22, 2018, I have learned the following, in substance and in part:
- a. CC-1 was in control of a bank account opened in the fake name of "Anthony Jefferson" (the "Jefferson Account") at a bank in the Bronx, New York ("Bank-1").
- b. On or about April 6, 2018, CC-1 texted another member of the Enterprise with a Ghana-based phone number ("CC-2") information for the Jefferson Account, including the account name and number, routing number, and bank address. After CC-1 sent the information for the Jefferson Account to CC-2, CC-1 texted the following, in substance and in part: "The bank info I sent u is my new [Bank-1] u can always use."
- c. On or about June 16, 2018, CC-1 texted another member of the Enterprise with a Ghana-based phone number ("CC-3") information for the Jefferson Account, including the account name and number, routing number, and bank address. On or about June 21, 2018, CC-3 texted CC-1 and stated, in substance and in part, that \$47,000 will be available today.
- 19. Based on my review of bank records for the Jefferson Account held at Bank-1, I have learned the following, in substance and in part:
- a. The last deposit in the Jefferson Account was a deposit of \$47,400 on or about June 19, 2018, three days before CC-1's arrest on or about June 22, 2018.

 $^{^{1}}$ The Traore Phone Number was at some point struck out on the interview notes and a second phone number provided by ASSANA TRAORE, the defendant, was written in.

- b. After CC-1 was arrested on or about June 22, 2018 and placed on home detention, there were ATM withdrawals in increments of \$500 or \$1,000 from the Jefferson Account on a nearly daily basis between on or about June 28, 2018 and on or about July 18, 2018, which totaled \$43,900.
- 20. Based on my review of photos from surveillance video of the ATM withdrawals from the Jefferson Account between on or about June 28, 2018 and on or about July 18, 2018, as well as my review of known photos of DEBORAH MENSAH, the defendant, and CC-1's sister, I believe that MENSAH and CC-1's sister withdrew fraud proceeds from the Jefferson Account while CC-1 was on home detention. Specifically, I believe MENSAH was present at the ATM withdrawals from the Jefferson Account with CC-1's sister on at least June 28, 2018 and July 1, 2, 5, 7, 8, 10, 11, and 16, 2018.
- 21. Based on my review of law enforcement records, I have learned that CC-1 and CC-1's sister both resided at the Mensah Address when the above-referenced cash withdrawals were made by DEBORAH MENSAH, the defendant, and CC-1's sister from the Jefferson Account.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of DEBORAH MENSAH and ASSANA TRAORE, the defendants, and that they be arrested and imprisoned or bailed, as the case may be.

WILLIAM R. MCKEEN

Special Agent

Federal Bureau of Investigation

Sworn to before me this 1st day of February, 2019

THE HONORABLE BARBARA C. MOSES UNITED STATES MAGISTRATE JUDGE SOUTHERN DISTRICT OF NEW YORK